

### REMARKS

Claims 1-24 are all the claims pending in the application, claims 21-24 being previously added. Claims 1, 8, 14, 21, and 24 are the only independent claims.

Applicant notes with appreciation that the Amendment filed on October 17, 2006, has been entered and made of record.

Claims 1, 3-9, and 11-19, 21, and 23-24 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Skelley (U.S. 6,795,638) in view of newly cited Middleton (U.S. Pub. 2002/0118300). Claims 2, 10, and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Skelley in view of Middleton and Escobar (U.S. 5,659,793). Claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Skelley in view of Middleton and further in view of Official Notice. Applicant respectfully traverses these rejections, and requests reconsideration and allowance of the pending claims in view of the following arguments.

Applicant submits that the conception date of the present application predates the earliest priority date of the newly cited Middleton reference. In particular, it is believed that the Office Action utilizes Middleton as a § 102(e) reference, within the context of the § 103(a) rejection. Accordingly, the earliest priority date of Middleton is the U.S. filing date of May 1, 2001, since the foreign filing date is not considered in a § 102(e) reference.

Applicant submits herewith a declaration of Mr. Gi-Up Cho pursuant to 37 CFR § 1.131. The declaration supports a conception date of the present application prior to the May 1, 2001, priority date of Middleton. The declaration further establishes diligent pursuit of the filing of the present application, resulting in a constructive reduction to practice of the subject matter disclosed, and claimed, on August 6, 2001.

Accordingly, Applicant submits that the Middleton reference should properly be withdrawn. Applicant further submits that none of the other cited art of record teach or suggest the features for which Middleton is relied upon in the present Action. Since Middleton has been used in the rejection of all claims 1-24, withdrawal of the rejection to these claims is believed proper and is respectfully requested.

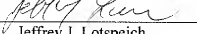
### **CONCLUSION**

In light of the above remarks, Applicant submits that the present Response places all claims of the present application in condition for allowance. Reconsideration of the application is requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles, California, telephone number (213) 623-2221 to discuss the steps necessary for placing the application in condition for allowance.

Respectfully submitted,  
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